



80 CR 600 Suite 203 · PO Box 1422  
Pagosa Springs, CO 81147  
970-403-5616

Received & Inspected

MAR 20 2017

FCC Mail Room

February 28, 2017

VIA Electronic Comment Filing System

DOCKET FILE COPY ORIGINAL

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

Re: EB Docket 06-36  
ECHO IT CONSULTING, LLC D/B/A "CONNECT WITH ECHO"  
Form 499 Filer ID: 831172  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2016

Dear Ms. Dortch:

I, Eric C. Hittle, certify that I am an officer of the company named above, and acting as an agent of Echo IT Consulting, LLC D/B/A "Connect with Echo" (hereinafter "Echo" or "Company"), that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules contained in 47 C.F.R. § 64.2001 *et seq.* Echo provides Voice over Internet Protocol ("VoIP") and broadband services to end user customers in rural areas of Colorado, but provides no mobile telecommunications or mobile broadband services. Echo's broadband and/or telecommunications CPNI practices operate to the same functional and practical effect of protecting customer privacy regardless of technology used.

Attached to this certification is a compliance statement explaining how the company's procedures and compliance with FCC CPNI requirements set forth in the FCC's Rules and applicable orders, including 47 C.F.R. § 64.2001 *et seq.* as well as in 47 C.F.R. § 64.1601.

The company has not taken actions (i.e., proceedings instituted or petitions filed by at either state commissions, the court system, or at the Commission) against pretexters or data brokers in the past year. Per 47 C.F.R. § 64.2009 (e), the company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

No. of Copies rec'd  
List ABCDE

0+4

The company represents and warrants that this certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric C. Hittle', with a stylized, flowing script.

Eric C. Hittle  
Owner

**CPNI Compliance Statement and Operating Procedures**  
**of Echo IT Consulting, LLC.**

Pursuant to 47 U.S.C. § 222, and the relevant FCC CPNI Rules and Orders, Eric C. Hittle, Owner, of Echo IT Consulting, LLC D/B/A "Connect with Echo" (hereinafter "Echo" or "Company"), and affiliated entities makes the following statement:

Echo has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules regarding the use, disclosure, and access to section 64.2001 et seq. of the FCC's Rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Company is compliant with the FCC's Customer Proprietary Network Information (CPNI) Rules and Orders.

Echo does not make available to any affiliated or unaffiliated entity any information that meets the definition of CPNI under 47 U.S.C. § 222(h)(1), except where required to do so by law. Echo therefore uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for VoIP and/or telecommunications or broadband services, and may use CPNI, if necessary, to protect its property rights. Echo does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Because Echo does not use CPNI for any purpose that requires customer approval, including 47 C.F.R § 64.2005, and does not, under any circumstances, provide CPNI to other entities, except where required by law, it has not implemented either "opt-out" or "opt-in" approval procedures pursuant to 47 C.F.R § 64.2007. If Echo determines to utilize CPNI in such a manner that would require customer permission, it will first obtain the required customer permissions according to relevant FCC's CPNI Rules and Orders.

Echo will disclose to a customer that customer's own CPNI after properly authenticating the customer as required by the FCC's CPNI Rules and Orders. Echo trains its personnel in both the use of CPNI and protection of its confidentiality. Echo also limits the number of employees that have access to customer information and call data.

Echo will timely notify law enforcement and customers of any breach of its customers' CPNI in accordance with FCC CPNI Rules and Orders. Records of any breaches discovered will be maintained for a minimum of two years.

Any proposed or desired use of CPNI inconsistent with these Policies and Procedures must be approved by Echo senior management and subject to appropriate legal review to ensure that such use is consistent with FCC CPNI Rules and Orders.

All employees and contractors are required to review and acknowledge understanding of this policy in writing on an annual basis